

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TIGER LILY VENTURES LTD.,

Movant,

v.

BARCLAYS CAPITAL INC.

Respondent.

Case No: 1:17-mc-00499-GBD-KNF

**DECLARATION OF RYAN A. GHISELLI
IN SUPPORT OF BARCLAYS'
OPPOSITION TO TIGER LILY
VENTURES LTD.'S MOTION TO
COMPEL**

RYAN A. GHISELLI, pursuant to 28 U.S.C. §1746, declares:

1. I am an attorney with Cowan, Liebowitz & Latman, P.C., attorneys for Barclays Capital Inc. ("Barclays") in the above-captioned proceeding. I submit this declaration in support of Barclays' opposition to Tiger Lily Ventures Ltd.'s motion to compel.

2. Attached hereto as **Exhibit 1** are true and correct copies of three Notices of Opposition filed with the Trademark Trial and Appeal Board ("TTAB") of the United States Patent & Trademark Office in the consolidated opposition captioned Barclays Capital Inc. v. Tiger Lily Ventures Ltd., Opposition Nos. 91219477 (Parent), 91219478 and 91219549 (herein referred to as the "Consolidated Opposition").

3. Attached hereto as **Exhibit 2** are true and correct copies of an October 7, 2015 Motion on Consent to Suspend Proceedings filed in the Consolidated Opposition and an October 14, 2015 TTAB Order granting the aforementioned motion.

4. Attached hereto as **Exhibit 3** are true and correct copies of a January 26, 2017 Motion on Consent to Extend Deadlines filed in in the Consolidated Opposition and a January 26, 2017 TTAB Order granting the aforementioned motion.

5. Attached hereto as **Exhibit 4** are true and correct excerpts from the transcript of the November 28, 2017 deposition of Ignacio V. Duran by Tiger Lily Ventures Ltd.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT. EXECUTED ON JANUARY 10, 2018 AT NEW YORK, NEW YORK.



Ryan A. Ghiselli